

**FILED**

APR -1 2020

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMSEY G. WINDSOR,

Defendant.

**4:20CR218 AGF/NAB**

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

(Assisting in the preparation of a fraudulent return)

1. During the time period covered by this Indictment, Ramsey G. Windsor ("Windsor"), a resident of St. Charles, Missouri, owned "STM, L.L.C.," ("STM") a mass-mailing business.
2. For tax years 2013 and 2014, Windsor did willfully aid and assist in, or procure, counsel, or advise the preparation and presentation to the Internal Revenue Service personal tax returns that were materially false by including false gross receipts for STM on Line 1 of STM's Schedule C.
3. The investigation revealed that during 2013 and 2014, Windsor deposited STM receipts from his biggest client into his personal bank account. Windsor later withdrew portions of those gross receipts and deposited them into STM's business account located at another bank. Windsor falsely classified portions of those deposits as "loans" or "owner loans." The remaining business receipts remaining in his personal account were not reported.

4. In tax year 2013, Windsor reported STM's gross receipts as \$1,668,181.00. Windsor failed to report \$350,207.50 gross receipts for the business. This failure to report resulted in a tax loss of \$142,420.00.
5. In tax year 2014, Windsor reported STM's gross receipts as \$1,598,625.00. Windsor failed to report \$686,614.00 of gross receipts. This failure to report resulted in a tax loss of \$161,876.00.
6. During the period covered by this Indictment, Windsor used accountant "J.H." to prepare his personal tax return. J.H. received Quickbook files from STM and used those files to prepare Windsor's returns.
7. On or about April 15, 2014, in the Eastern District of Missouri, the defendant,

**RAMSEY G. WINDSOR,**

a resident of St. Charles, Missouri, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of Ramsey G. Windsor, for the calendar year 2013. The return was false and fraudulent as to a material matter, in that Ramsey G. Windsor reported business gross receipts on Schedule C, Line 1, in the amount of \$1,668,181.00, whereas, as the defendant then and there knew, that he had underreported said business gross receipts by failing to report \$350,207.50 of business gross receipts, thereby resulting in a tax loss of \$142,420.00.

In violation of Title 26, United States Code, Section 7206(2).

**COUNT TWO**

(Assisting in the preparation of a fraudulent return)

The Grand Jury further charges that:

1. The allegations set forth in paragraphs 1 through 6 of Count One are re-alleged and incorporated as though set forth in full herein.
2. On or about October 15, 2015, in the Eastern District of Missouri, the defendant,  
**RAMSEY G. WINDSOR,**  
a resident of St. Charles, Missouri, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of Ramsey G. Windsor, for the calendar year 2014. The return was false and fraudulent as to a material matter, in that Ramsey G. Windsor reported business gross receipts on Schedule C, Line 1, in the amount of \$1,598,625.00, whereas, as the defendant then and there knew, that he had underreported said business gross receipts by failing to report \$686,614.00 of business gross receipts, thereby result in a tax loss of \$161,876.00.

In violation of Title 26, United States Code, Section 7206(2).

A TRUE BILL

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FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

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JENNIFER J. ROY  
Assistant United States Attorney